

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates.

Major media serves an important function as a cornerstone of a healthy democracy because one of the requirements of such a system of governance is that the voting public be informed about their choices. Because of this unique trust, it cannot simply be seen as another actor in a capitalist economy whose sole role is to maximize profit for its owners, like a retail store chain or a restaurant. It has a much higher calling to satisfy in our country. That said, I find the trend towards media consolidation alarming and damaging to the functions of our democracy.

I know the evidence of massive media consolidation is well known to your office, so I will not spend time recounting it here. Suffice it to say that I strongly disagree with any implication that simply a larger number of media outlets can be equated to true diversity of opinion ... a diversity that must be represented for the media to serve its societal function in America. True diversity will only be realized when the ownership of our major media is as diversified as our population and when they believe (or are required to act as if they believe) that they are holding a sacred public trust in controlling the public's airwaves.

In addition, the ownership of media outlets by persons who live far from the communities that are being served leads to a large fissure between the need to understand local issues (to vote for local elections) and the need of these large, economic entities to reduce costs by reducing expensive local news representatives and by replacing them with carbon copy national news stories. By the same token, local culture as represented by arts and music suffers due to the incentive to use template programming and to share playlists across the country (especially if the media conglomerate is also owner of the record companies whose artists are represented on those playlists). Unless some standards of local ownership are maintained, these problems will increase dramatically.

Therefore, I am strongly opposed to any actions that would reduce the number of barriers to ownership of multiple media outlets in a single market. I believe that the concentrated ownership of media by economic entities that may have very little regard for the higher purpose media serves in our country harms democracy, harms our local culture, and harms our local economies. As the leading watchdog organization for these entities, I ask that you honestly consider what would be in the best interest of the American public and reject any rule alterations that would reduce diversity in media ownership.